

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MWK RECRUITING, INC.**

**Plaintiff,**

**v.**

**EVAN P. JOWERS, YULIYA  
VINOKUROVA, ALEJANDRO  
VARGAS, and LEGIS VENTURES  
(HK) COMPANY LIMITED (aka  
Jowers / Vargas),**

**Defendants.**

**Civil Action No. 1:18-cv-00444**

**EVAN P. JOWERS**

**Counterclaimant,**

**v.**

**MWK RECRUITING, INC., ROBERT  
E. KINNEY, MICHELLE W. KINNEY,  
RECRUITING PARTNERS GP, INC.,  
KINNEY RECRUITING LLC,  
COUNSEL UNLIMITED LLC, and  
KINNEY RECRUITING LIMITED**

**Counter-defendants.**

**NOTICE OF COMPLIANCE WITH MAGISTRATE'S ORDER  
BY THE MWK ENTITIES**

On December 18, 2020, the Court ordered that the MWK Entities take certain steps on or prior to January 5, 2021. This is to provide notice to the Court that the MWK Entities have complied with the Court's Order by taking the following steps:

**1. Verifications - Dkt. 236, at 9, fn. 6.**

On December 31, 2020, the MWK entities notified Jowers's counsel that the MWK Entities believe verifications have all been provided as required via supplemental verifications sent July 24 and November 23 and requested notification if he disagrees. No disagreement has been registered as of the date of this filing.

**2. Blank Privilege Log – Dkt. 236, at 10.**

On December 31, 2020, this issued was clarified in a communication to counsel for Jowers as ordered.

**3. Original Assignments – Dkt. 236, at 12.**

On January 4, 2021, the MWK Entities provided a formal supplemental response to the various RFPs seeking originals of the assignments to state whether those originals still exist.

**4. Modified Protective Order – Dkt. 236, at 8.**

On January 5, 2021, the parties filed an Agreed Motion to Amend Confidentiality and Protective Order, complying with the Court's order.

**5. Depositions – Dkt. 236, at 17.**

The MWK Entities anticipate being able to agree on deposition dates. The MWK Entities look forward to communicating with local counsel for Jowers about this issue once appointed, but on December 31, 2020, the MWK Entities proactively asked Mr. Tauler to let them know what time frame he was considering for depositions and have not received a response yet as of this filing.

Dated: January 5, 2021

Respectfully Submitted,

/s/ Robert E. Kinney

Robert E. Kinney  
Texas State Bar No. 00796888  
Robert@KinneyRecruiting.com

**Robert E. Kinney**  
824 West 10<sup>th</sup> Street, Suite 200  
Austin, Texas 78701  
Tel: (512) 636-1395

**ATTORNEY PLAINTIFF MWK AND FOR  
COUNTER-DEFENDANTS**

Raymond W. Mort, III  
Texas State Bar No. 00791308  
raymort@austinlaw.com

**THE MORT LAW FIRM, PLLC**  
100 Congress Ave, Suite 2000  
Austin, Texas 78701  
Tel/Fax: (512) 865-7950

**ATTORNEYS FOR PLAINTIFF MWK  
AND FOR COUNTER-DEFENDANTS**